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September 23, 2002
Marlene H. Dortch
Secretary
Federal Communications Commission
445 12 St., S.W.
Washington, D.C. 20554

**Re: Ex Parte, Implementation of the Pay Telephone Reclassification and
Compensation Provisions of the Telecommunications Act of 1996, CC
Docket No. 96-128.**

Dear Ms. Dortch:

Thursday, September 19, Larry Fenster, Richard Whitt, and Craig Crowley of WorldCom, Inc., met with Matthew Brill from Commissioner Abernathy's Office. The attached materials were handed out at the meeting. We rebutted claims that interexchange carriers were compensated through other means for the under-recovery of their payphone compensation expenses. We discussed the extent to which WorldCom was under-compensated during the Interim and Intermediate Periods. We also discussed that it would be incorrect to presume that payphone service providers would not be compensated by WorldCom. Finally, we also discussed the administrative infeasibility of requiring underlying carriers to compensate on behalf of switch-based resellers who have their own carrier identification codes (CICs). Since these resellers obtain service from many underlying carriers, no one carrier "owns" such resellers.

Sincerely,

Larry Fenster

Larry Fenster

Cc: Matthew Brill